

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

CIVIL ACTION NO. 17-AV-99999

Jeff Hawkins and Tamra Hawkins,
individually and as guardians for their
minor child, S.H.,

Plaintiffs,

vs.

County of Pickens, South Carolina, Duke
Energy Carolinas, LLC, John Does.

Defendants.

(State Case No.: 2017-CP-39-01392)

**DEFENDANT COUNTY OF PICKENS
ANSWERS TO LOCAL RULE 26.01
INTERROGATORIES**

**TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, ANDERSON DIVISION, AND ALL PARTIES OF RECORD**

The Defendants, County of Pickens, South Carolina, and any and all John Does
(hereinafter "Defendants"), by and through their undersigned counsel, hereby submit the
following Answers to Local Rule 26.01 Interrogatories:

(A) State the full name, address, and telephone number of all persons or
legal entities who may have a subrogation interest in each claim and state the basis and
extent of said interest.

ANSWER: Unknown at this time.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER: All claims should be tried by a jury because a question of fact
exists.**

(C) State whether the party submitting these responses is a publicly-owned
company and separately identify: (1) any parent corporation and any publicly-held
corporation owning ten percent (10%) or more of the party's stock: (2) each publicly-

owned company of which it is a parent and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: None.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER: The Defendant believes the Anderson Division is appropriate because the alleged incident occurred in Pickens County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a 26 determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: No.

(F) [*Defendants only.*] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: The Defendant Pickens County is properly identified. The Defendants would submit that the use of John Does in the context of this actions is improper.

(G) [*Defendants only.*] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Unknown at this time.

CLAWSON and STAUBES, LLC

s/ Amy M. Snyder

Amy M. Snyder
District of S.C. Federal Bar No.: 0980
1000 E North Street, Suite 200
Greenville, South Carolina 29601-3106
Phone: (864) 331-8940
Fax: (864) 232-2921
Email: asnyder@clawsonandstaubes.com
Attorney for County of Pickens and John Does

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